

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF PUERTO RICO

IN RE:)
)
IRIS V. MULERO RIVERA) No. 11-01093-SEK13
)
Debtor.) Chapter 13
_____)

OBJECTION TO PLAN

COMES NOW the United States and objects to confirmation of the debtor's amended chapter 13 payment plan, dated August 4, 2011, because the plan fails to provide for payment of the United States' secured tax claim. On March 16, 2011, the Internal Revenue Service filed an amended proof of claim for taxes. This proof of claim contains a secured portion of \$12,348.11. The debtor's plan appears to provide payment of only \$1,800 to the United States on account of this secured tax claim.

WHEREFORE, the United States respectfully prays that the Court deny confirmation of the debtor's amended plan dated August 4, 2011.

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DATED: August 5, 2011.

JOHN A. DiCICCO
Principal Deputy Assistant Attorney General
Tax Division

/s/ W. Bradley Russell
W. BRADLEY RUSSELL
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CERTIFICATE OF SERVICE

IT IS CERTIFIED that the foregoing document was served this 28th day of September 2011, by filing the same with the Clerk of the Court using the ECF filing system which shall send notification to the following:

Jose M. Prieto Carballo, Esquire
JPC Law Office
P.O. Box 336565
San Juan, Puerto Rico 00936-3565

Alejandro Oliveras Rivera
Chapter 13 Trustee
Post Office Box 9024062
San Juan, Puerto Rico 00902-4062

IT IS FURTHER CERTIFIED that the foregoing document was served the 5th day of August 2011, by United States mail addressed to the following:

Monsita LeCaroz Arribas
Office of the United States Trustee
Ochoa Building
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901

/s/ W. Bradley Russell
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